

**GOTTLIEB & ASSOCIATES PLLC**  
**ATTORNEYS**

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April 25, 2024

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

*Re: Herrera v. Val Group International Inc.,*  
Case No.: 1:24-cv-1815

Dear Judge Schofield,

The undersigned represents Edery Herrera, on behalf of himself and all other persons similarly situated (“Plaintiff”), in the above-referenced action against Defendant, Val Group International Inc. (“Defendant”). In response to Your Honor’s Order on April 22, 2024, (Dkt. 7), the undersigned informs Your Honor that we have not yet been contacted by the Defendant in this matter. By way of background, this case was filed on March 8, 2024 and has been out for service for over a month. We have attempted to serve the Defendant at two separate addresses and are working with the process server on effectuating service. We have also sent courtesy copies of the Summons and Complaint via email to the Defendant. Therefore, we respectfully request that the Initial Conference now scheduled for May 1, 2024 be adjourned for 45 days while we continue our efforts to effectuate service. Further, the undersigned sincerely apologizes for the lateness of this request however lead counsel in this matter, Jeffrey Gottlieb was hospitalized due to an emergency medical situation.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

**GOTTLIEB & ASSOCIATES PLLC**

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.